BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2006   **:**   **DOCKET NO. R2006-1**
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FOLLOW-UP INTERROGATORY FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS BOZZO
(UPS/USPS-T12-47)
(August 4, 2006)
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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby

files the following follow-up interrogatory directed to United States Postal Service

witness Bozzo: UPS/USPS-T12-47.

Respectfully submitted,

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UPS/USPS-T12-47. Refer to your response to UPS/USPS-T12-38, in which you characterize the term "intermittent presence" as "vague." To clarify, the word "gap" in the following questions refers to situations in which in your data at a particular site for a particular MODS operation: (1st) shows positive hours ("HRS") and total piece handlings ("TPH") in some time period; (2nd) has zero HRS and TPH in a subsequent period; and (3rd) is then followed by a later period showing positive HRS and TPH.

(a)   You indicate in your response that "certain operations, particularly Priority Mail and parcel sorting, may only be present in some facilities at periods such as seasonal peaks." Identify all of the MODS operations other than Priority Mail and parcel sorting that "may only be present in some facilities at [certain] periods."

(b)   Identify and explain in detail any reasons other than the need to accommodate seasonal peaks that might cause a MODS operation to shut down temporarily, creating a gap as defined above.

(c)   Explain in detail how one might distinguish a gap created by the temporary shutdown of a MODS operation from a gap caused by a non-reporting or other data error.